

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket No. 970**

**CERTIFICATION OF NO OBJECTION REGARDING SIXTH MONTHLY FEE  
APPLICATION OF BAKER & HOSTETLER LLP, AS SPECIAL LITIGATION  
AND CORPORATE COUNSEL FOR THE DEBTORS, FOR ALLOWANCE  
OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023**

The undersigned hereby certifies that, as of the date hereof, they have received no answer, objection, or other responsive pleading with respect to the sixth monthly fee application for compensation and reimbursement of expenses (the “**Monthly Application**”) of Baker & Hostetler LLP (“**Applicant**”) listed on **Exhibit A** attached hereto. The Monthly Application was filed with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on February 13, 2024. The undersigned further certifies that they have reviewed the Court’s docket in this case and no answer, objection or other responsive pleading to the Monthly Application appears thereon. Pursuant to the Notice of Fee Application filed with the Monthly Application, objections to the Monthly Application were to be filed and served no later than **March 4, 2024 at 4:00 p.m. (ET)**. The Monthly Application was filed and served in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11*

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

*Professionals and Committee Members*, entered July 25, 2023 [D.I. 181] (the “**Interim Compensation Order**”).

Consequently, pursuant to the Interim Compensation Order, the debtors and debtors in possession in the above-captioned cases are authorized to pay Applicant eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the Monthly Application upon the filing of this certification without the need for a further order of the Court. A summary of the fees and expenses sought by Applicant is annexed hereto as **Exhibit A**.

Dated: March 7, 2024  
Wilmington, Delaware

Respectfully submitted,

<p><u>/s/ Morgan L. Patterson</u>  <b>WOMBLE BOND DICKINSON (US) LLP</b>  Donald J. Detweiler (DE Bar No. 3087)  Morgan L. Patterson (DE Bar No. 5388)  1313 North Market Street, Suite 1200  Wilmington, Delaware 19801  Telephone: (302) 252-4320  Facsimile: (302) 252-4330  don.detweiler@wbd-us.com  morgan.patterson@wbd-us.com</p> <p><i>Counsel to the Debtors and Debtors in Possession</i></p>	<p><b>WHITE &amp; CASE LLP</b>  Thomas E Lauria (admitted <i>pro hac vice</i>)  Matthew C. Brown (admitted <i>pro hac vice</i>)  Fan B. He (admitted <i>pro hac vice</i>)  200 South Biscayne Boulevard, Suite 4900  Miami, FL 33131  Telephone: (305) 371-2700  tlauria@whitecase.com  mbrown@whitecase.com  fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>)  1221 Avenue of the Americas  New York, NY 10020  Telephone: (212) 819-8200  david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>)  111 South Wacker Drive, Suite 5100  Chicago, IL 60606  Telephone: (312) 881-5400  jzakia@whitecase.com</p>
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	<p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Co-Counsel to Debtors and Debtors in Possession</i></p>
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**EXHIBIT A**Professional Fees and Expenses  
Monthly Fee Application

<b>Applicant</b>	<b>Fee Application Period, Filing Date, D.I.</b>	<b>Total Fees Requested</b>	<b>Total Expenses Requested</b>	<b>Objection Deadline:</b>	<b>Amount of Fees Authorized to be Paid @ 80%</b>	<b>Amount of Expenses Authorized to be Paid at 100%</b>	<b>Amount of Holdback Fees Requested</b>
Baker & Hostetler LLP	12/1/23 – 12/31/23 D.I. 970	\$74,442.15 <sup>2</sup>	\$38.38	3/4/24	\$59,553.72	\$38.38	\$14,888.43

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<sup>2</sup> Baker & Hostetler reduced the amount requested by \$8,271.35 as a result of courtesy discounts that been applied consistent with past practices.